

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK


BUYERS AND RENTERS UNITED TO)
SAVE HARLEM; and)
)
MARJORIE and THEODORE CHARRON;)
ANTHONY CASASNOVAS; KAREN)
FLANNAGAN; ANDRES MARES-MURO;) **NOTICE OF MOTION FOR**
TRACEY MOORE; RAYMOND ANDREW) **ADMISSION *PRO HAC VICE* OF**
STAHL-DAVID; RUSSELL TAYLOR;) **ANDREW A. JACOBSON**
DIANE TRUMMER; and KIM POWELL,)
on behalf of themselves and all others)
similarly situated,) No. 07 CIV 6316
)
Plaintiffs,)
)
v.)
)
PINNACLE GROUP NY LLC; PINNACLE)
GROUP, LLC; and JOEL WIENER,)
)
Defendants.)

PLEASE TAKE NOTICE, that upon the declaration of Chinh Q. Le, Esq., Plaintiffs,
Buyers and Renters United to Save Harlem ("BRUSH") and Marjorie and Theodore Charron,
Anthony Casasnovas, Karen Flannagan, Andres Mares-Muro, Tracey Moore, Raymond Andrew
Stahl-David, Russell Taylor, Diane Trummer, and Kim Powell, on behalf of themselves and all
others similarly situated, by their attorneys Jenner & Block LLP, respectfully move the Court,
pursuant to Local Rule 1.3(c), for an Order allowing the admission *pro hac vice* of Andrew A.
Jacobson, Esq., Jenner & Block LLP, 330 N. Wabash Avenue, Chicago, IL 60611-7603, (312)
222-9350, (312) 527-0484 (facsimile), for the pendency of the above-captioned case or further
order of this Court. There are no pending disciplinary proceedings against Andrew A. Jacobson
in any State or Federal court. A proposed order is submitted with this motion.

Dated: September 20, 2007

Respectfully,

JENNER & BLOCK LLP

By: 
Chinh Q. Le (CL-9036)
919 Third Avenue
37th Floor
New York, New York 10022
(212) 891-1600
(212) 891-1699

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Chinh Q. Le, certify that copies of the foregoing Notice of Motion for *Pro Hac Vice* Admission of Andrew A. Jacobson, Declaration of Andrew A. Jacobson in Support of Motion for Admission *Pro Hac Vice*, Declaration of Chinh Q. Le in Support of Motion *Pro Hac Vice* Admission of Andrew A. Jacobson and proposed Order granting *Pro Hac Vice* Admission of Andrew A. Jacobson, were served this 20th day of September, 2007 upon Defendants counsel, by first class mail, postage prepaid, as follows:

Mitchell A. Karlan, Esq.
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
47th Floor
New York, NY 10166-0193
(212) 351-4000

Attorneys for Defendants


CHINH Q. LE

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BUYERS AND RENTERS UNITED TO
SAVE HARLEM; and

MARJORIE and THEODORE CHARRON;
ANTHONY CASASNOVAS; KAREN
FLANNAGAN; ANDRES MARES-MURO;
TRACEY MOORE; RAYMOND ANDREW
STAHL-DAVID; RUSSELL TAYLOR;
DIANE TRUMMER; and KIM POWELL,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

PINNACLE GROUP NY LLC; PINNACLE GROUP, LLC; and JOEL WIENER,

Defendants.

**DECLARATION OF CHINH Q. LE IN
SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE* OF
ANDREW A. JACOBSON**

No. 07 CIV 6316

I, CHINH Q. LE, declare as follows:

1. I am a member in good standing of the bar of this Court.
2. This declaration is made in support of the motion by Plaintiffs, Buyers and Renters United to Save Harlem (“BRUSH”) and Marjorie and Theodore Charron, Anthony Casasnovas, Karen Flannagan, Andres Mares-Muro, Tracey Moore, Raymond Andrew Stahl-David, Russell Taylor, Diane Trummer, and Kim Powell, on behalf of themselves and all others similarly situated (collectively, “Plaintiffs”), seeking admission *pro hac vice* of Andrew A. Jacobson pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York.

3. Andrew A. Jacobson is a partner in the firm of Jenner & Block LLP, 330 N. Wabash Ave., Chicago, Illinois, 60611 and has been practicing law since 1992. He is a member in good standing with the bar of the State of Illinois. *See* Certificate of Good Standing attached as Exhibit A to the Declaration of Andrew A. Jacobson in Support of Motion for Admission *Pro Hac Vice*.

4. He has advised me that he is familiar with the Federal Rules of Civil Procedure and with the Local Rules of this Court.

5. There are no disciplinary proceedings currently pending against Mr. Jacobson in any state or federal court.

6. I believe Mr. Jacobson will conduct himself in the manner required of attorneys that practice in, and are admitted to, this Court, and therefore I respectfully request that he be admitted *pro hac vice* for the purpose of representing Plaintiffs during the pendency of this action or on further order of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: September 20, 2007


CHINH Q. LE (CL-9036)

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BUYERS AND RENTERS UNITED TO)
SAVE HARLEM; and)
)
MARJORIE and THEODORE CHARRON;) **DECLARATION OF ANDREW A.**
ANTHONY CASASNOVAS; KAREN) **JACOBSON IN SUPPORT OF MOTION**
FLANNAGAN; ANDRES MARES-MURO;) **FOR ADMISSION *PRO HAC VICE***
TRACEY MOORE; RAYMOND ANDREW)
STAHL-DAVID; RUSSELL TAYLOR;) No. 07 CIV 6316
DIANE TRUMMER, and KIM POWELL,)
on behalf of themselves and all others)
similarly situated,)
)
Plaintiffs,)
)
v.)
)
PINNACLE GROUP NY LLC; PINNACLE)
GROUP, LLC; and JOEL WIENER,)
)
Defendants.)

I, ANDREW A. JACOBSON, declare as follows:

1. I am a resident of Illinois and have been a practicing attorney in the State of Illinois since 1992. I am a partner with the law firm of Jenner & Block LLP, which maintains an office at 330 N. Wabash Avenue, Chicago, Illinois, 60611.

2. I make this declaration in support of my application for admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York to serve as counsel for Plaintiffs, Buyers and Renters United to Save Harlem; Marjorie and Theodore Charron; Anthony Casasnovas; Karen Flannagan; Andres Mares-Muro; Tracey Moore; Raymond Andrew Stahl-David; Russell Taylor; Diane Trummer, and Kim Powell in the above-captioned matter. My admission *pro hac vice* will serve Plaintiffs' interests, and will facilitate the efficient litigation of this matter, given my firm's representation of Plaintiffs on this matter to date.

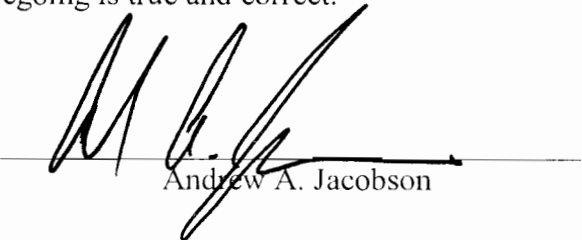
3. I was admitted to practice before the courts in the following jurisdictions on the dates set forth below:

- a. State of Illinois Supreme Court (1992);
- b. U.S. District Court for the Northern District of Illinois (1992);
- c. U.S. Court of Appeals for the Federal Circuit (2000);
- d. U.S. Court of Appeals for the First Circuit (2007).

4. I am a member in good standing of the foregoing bars, and I have never been disbarred or suspended. Moreover, there are no disciplinary proceedings pending against me. A true and correct copy of my Certificate of Good Standing issued by the Supreme Court of Illinois is attached at Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: September 17, 2007



Andrew A. Jacobson

CERTIFICATE OF GOOD STANDING



United States of America

} ss. Andrew Allen Jacobson

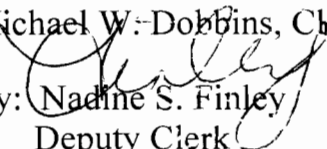
Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Andrew Allen Jacobson
was duly admitted to practice in said Court on (12/23/1992)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (09/20/2007)

Michael W. Dobbins, Clerk,

By:  Nadine S. Finley
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|---|
| BUYERS AND RENTERS UNITED TO |) | |
| SAVE HARLEM; and |) | |
| |) | |
| MARJORIE and THEODORE CHARRON; |) | |
| ANTHONY CASASNOVAS; KAREN |) | [PROPOSED] ORDER GRANTING |
| FLANNAGAN; ANDRES MARES-MURO; |) | ADMISSION <i>PRO HAC VICE</i> OF |
| TRACEY MOORE; RAYMOND ANDREW |) | ANDREW A. JACOBSON |
| STAHL-DAVID; RUSSELL TAYLOR; |) | |
| DIANE TRUMMER; and KIM POWELL, |) | |
| on behalf of themselves and all others |) | No. 07 CIV 6316 |
| similarly situated, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| PINNACLE GROUP NY LLC; PINNACLE |) | |
| GROUP, LLC; and JOEL WIENER, |) | |
| |) | |
| Defendants. |) | |

The motion for admission of Counsel *pro hac vice* in this matter having come before and been considered by the Court, and the Court being satisfied that Andrew A. Jacobson, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby

ORDERED that the Motion for Admission *Pro Hac Vice* of Andrew A. Jacobson, Esq., is GRANTED and Andrew A. Jacobson is admitted to the Bar of this Court *pro hac vice* as counsel for Plaintiffs.

Dated: September 20, 2007

UNITED STATES DISTRICT JUDGE